



Wichita Plant



April 29, 2015

CERTIFIED MAIL 7013 2250 0001 0126 5636
Return Receipt Requested

U.S. Environmental Protection Agency Region 7
Attn: Chief, RCRA Corrective Action and Permits Branch
Air, RCRA and Toxics Division
11201 Renner Boulevard
Lenexa, Kansas 66219

**RE: 1st QUARTER 2015 QUARTERLY PROGRESS REPORT; OCCIDENTAL
CHEMICALS CORPORATION, WICHITA PLANT; USEPA ID# KSD007482029**

Dear Sir:

Enclosed please find the Quarterly Progress Report, as required by Occidental Chemical Corporation's RCRA hazardous waste permit number KSD007482029. This report summarizes the activities conducted for Part II of the Facility's RCRA Permit during the first quarter of 2015. In addition, please find enclosed the most recent version of the RFI Schedule, which is dated April 28, 2015 along with the most recent Vapor Intrusion ICM Monitoring Report for the first quarter of 2015, for your review and use. If you have any questions, please call Lisa R. Thurman at 316/529-7204.

Sincerely,

Steve Hieger
Plant Manager

RCRA



536027

Enclosure

c.c.: Mostafa Kamal; KDHE
Brad Roberts, USEPA Region VII
Juan Somoano; GSHI
Lisa Thurman; OCC
Bruce Clegg; CRA

CERTIFIED MAIL: 7013 2250 0001 0126 5643
CERTIFIED MAIL: 7013 2250 0001 0126 5681

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AWMD/RCAP

Occidental Chemical Corporation, Quarterly Progress Report January 1, 2015 through March 31, 2015

Pursuant to Occidental Chemical Corporation's (OCC) hazardous waste permit KSD007482029, Part II, Section C.13, OCC is submitting this quarterly progress report. This report updates the progress of RCRA Corrective Action activities conducted during the first quarter of 2015.

- Submitted the second 2014 semi-annual groundwater monitoring report.
- A quarterly building monitoring and inspection event was completed. The completed reporting form is attached hereto.
- Completed construction and commenced startup of the new wastewater treatment plant (third carbon adsorption system) for interceptor wells IW40, IW44, IW45, and IW46.
- Continued operation of the interceptor well network for groundwater control around Occidental's Wichita plant.
- Prepared responses to EPA comments and a Revised Human Health Risk Assessment Work Plan.
- Submitted responses to EPA comments and a Revised Final Comprehensive RFI Summary Report to the EPA.
- Submitted a Notification of Plant Changes to EPA for modifications to Sump 417.
- There have been no releases of hazardous materials to report.

Work scheduled for the second quarter of 2015 includes:

- Complete the first 2015 semi-annual groundwater monitoring event.
- Continue operation of the interceptor well network for groundwater control around Occidental's Wichita plant.
- Submit responses to EPA comments and a Revised Human Health Risk Assessment Work Plan.
- Continue with startup and evaluation of the wastewater treatment plant and extraction well conveyance system for interceptor wells IW40, IW44, IW45, and IW46.
- Commence the Human Health Risk Assessment in accordance with the Human Health Risk Assessment Work Plan pending EPA review and approval.
- Complete a quarterly building inspection and pressure monitoring event.
- Prepare a Corrective Measures Study Work Plan.
- Submit a work plan to evaluate the vapor intrusion pathway for occupied buildings located at the Facility.

Notifications:

- None.

| CORRECTIVE ACTION CHRONOLOGY | |
|------------------------------|--|
| DATE | EVENT |
| 07/07/2008 | Draft Work Plan for Indoor Soil Gas Sampling |
| 07/07/2008 | Comments to QAPP Addendum 04/18/08 |
| 07/07/2008 | Spring 2008 Neighbor Results |
| 07/11/2008 | Request for Interim Measures for Railroad Tracked Areas |
| 07/25/2008 | Revised Asbestos Surface Impoundment SWMU Interim Corrective Measure Implementation Report |
| 07/28/2008 | 2008 2nd Quarter Progress Report |
| 08/05/2008 | Comments to Draft Work Plan for Collection & Analysis of Groundwater Samples (Appendix 9) |
| 08/08/2008 | Notice of Plug & Abandonment of DW #4 |
| 08/08/2008 | Request for Extension of QAPP Comment Response |
| 08/15/2008 | Response to Railroad Tracked Areas Interim Measures Letter |
| 08/18/2008 | Interim Corrective Measures Implementation Report for Asbestos Surface Impoundment SWMU |
| 09/03/2008 | Draft Work Plan for Collection & Analysis of Groundwater Samples (Appendix 9) |
| 09/19/2008 | Revised Draft Work Plan for Indoor Soil Gas Sampling |
| 09/22/2008 | Comments to Draft Work Plan for Indoor Soils Gas Sampling |
| 09/30/2008 | Approval Letter for Work Plan for Indoor Soils Gas Sampling |
| 10/03/2008 | Comments to Draft Work Plan for Collection & Analysis of Groundwater Samples (Appendix 9) |
| 10/30/2008 | Appendix IX Semi-Annual Groundwater Monitoring Report |
| 11/03/2008 | Draft Work Plan for Collection & Analysis of Groundwater Samples |
| 11/21/2008 | Off-Site Soils Gas Sampling Data Evaluation Report |
| 11/21/2008 | Off-Site Geoprobe Groundwater Investigation Report |
| 01/05/2009 | Draft QAPP |
| 01/19/2009 | Indoor Soils Gas Sampling Report |
| 01/23/2009 | Sub-Slab Soils Gas Sampling |
| 01/28/2009 | Semi-Annual Neighbor Well Data |
| 01/28/2009 | 4 th Quarter Corrective Action Report |
| 02/10/2009 | Direct Push Investigation Comments to EPA |
| 02/12/2009 | Off-Site Geoprobe Groundwater Investigation Report |
| 02/20/2009 | Soil Gas Sampling Data Evaluation Comments to EPA |
| 03/19/2009 | Soils Gas Sampling Data Evaluation |
| 03/26/2009 | 2009 Ongoing Activities Cost Estimate |



| DATE | CORRECTIVE ACTION CHRONOLOGY EVENT |
|------------|---|
| 04/20/2009 | Off-Site Geoprobe Report |
| 04/21/2009 | Email responding to QAPP Comments |
| 04/30/2009 | Semi-Annual Groundwater Report |
| 04/30/2009 | Monitor Well Inspection Summary Report |
| 05/08/2009 | Response to Comments for Sub-Slab Soils Gas Sampling Report |
| 06/08/2009 | Final QAPP and SAP Reports |
| 06/30/2009 | RFI Investigation Work Plan for Landfill, Hex Pits, and Brine Ponds |
| 06/30/2009 | ICM Effectiveness Evaluation Report |
| 08/26/2009 | Revised RFI Work Plan for Alpha Cake Landfill, Hex Waste Pits and Brine Ponds |
| 09/14/2009 | Response to EPA's Comments letter dated July 9, 2009 regarding on-Site vapor intrusion |
| 09/14/2009 | On-Site Vapor Intrusion Investigation, Assessment and Interim Corrective Measures Implementation Report |
| 11/30/2009 | Draft Penta Area and Shipping RFI Work Plan |
| 12/14/2009 | Response to EPA Comments & Submission of Revised Interceptor Well ICM Effectiveness Evaluation Report |
| 12/22/2009 | Supplemental Off-Site Soil Gas Sample Collection and Analysis, 1 st Quarterly, letter submission |
| 12/30/2009 | Preliminary Draft Phase I Summary/Phase II Recommendations letter report |
| 01/15/2010 | Response to EPA Comments – On-Site VI, Assessment & Interim ICM Implementation Report |
| 02/12/2010 | Final Revision to Interceptor Well ICM Effectiveness Report |
| 02/12/2010 | Second 2009 Semiannual Groundwater Monitoring Report |
| 02/16/2010 | Received comments from EPA for Penta Area and Shipping RFI Work Plan |
| 02/19/2010 | Phase I Summary/Phase II Recommendations Letter Report (final), Alpha Cake Landfill, Hex Waste Pits and Brine Ponds RFI Work Plan |
| 04/30/2010 | Response to EPA Comments – Penta Area and Shipping RFI Work Plan |
| 04/30/2010 | Revised Penta Area and Shipping RFI Work Plan |
| 05/17/2010 | Resampling of MW137S1 Letter to EPA |
| 05/28/2010 | Inorganics Area RFI Work Plan |
| 07/09/2010 | Received comments from EPA for Inorganics Area RFI Work Plan |
| 08/11/2010 | Response to EPA Comments – Inorganics Area RFI Work Plan |
| 08/11/2010 | Revised Inorganics Area RFI Work Plan |
| 08/24/2010 | First Semiannual Groundwater Monitoring Report |
| 09/23/2010 | Groundwater Screening (near MW-140) Investigation Summary Letter |

| CORRECTIVE ACTION CHRONOLOGY | |
|------------------------------|--|
| DATE | EVENT |
| 08/24/2010 | First Semiannual Groundwater Monitoring Report |
| 09/23/2010 | Groundwater Screening (near MW-140) Investigation Summary Letter |
| 10/4/2010 | Operation and Maintenance Plan for On-Site Vapor Intrusion ICM for on-Site buildings |
| 10/15/2010 | RFI Summary Report for the Alpha Cake Landfill, Hex Waste Pits and Brine Ponds |
| 10/29/2010 | Supplemental Quarterly Off-Site Soil Gas Monitoring Summary Report |
| 12/20/2010 | Response to EPA Comments on the Operation and Maintenance Plan for On-Site Vapor Intrusion ICM for on-Site buildings |
| 12/16/2010 | Received comments from EPA for Supplemental Quarterly Off-Site Soil Gas Monitoring Summary Report |
| 12/16/2010 | Received comments from EPA for RFI Summary Report, Alpha Cake Landfill, Hex Waste Pits and Brine Ponds |
| 12/30/2010 | Comprehensive Well Survey letter submittal to EPA |
| 1/4/2011 | Penta Area and Shipping RFI Summary Report |
| 1/17/2011 | Response to EPA comments and revised Supplemental Quarterly Off-Site Soil Gas Monitoring Summary Report |
| 1/18/2011 | Response to EPA comments and revised RFI Summary Report – Landfill Areas |
| 2/16/2011 | Inorganic Area RFI Summary Report |
| 2/23/2011 | Second 2010 Semiannual Groundwater Monitoring Report |
| 3/2/2011 | Draft Conceptual Design Summary for Groundwater ICM Modifications |
| 4/18/2011 | Chloromethanes I, II, Perc and Hazwaste Areas RFI Work Plan |
| 4/18/2011 | Arkema Area Investigative Work Plan |
| 4/29/2011 | Response to EPA comments and revised RFI Summary Report – Penta Area and Shipping |
| 4/29/2011 | Response to EPA comments and revised RFI Summary Report – Inorganics Area |
| 5/2/2011 | On-Site Vapor Intrusion Mitigation ICM Construction Completion Report |
| 6/17/2011 | Response to EPA comments and revised Preliminary Conceptual Design Groundwater ICM Modifications Rpt |
| 6/30/2011 | On-Site Groundwater RFI Work Plan |
| 6/30/2011 | Vapor Intrusion ICM Inspection and Pressure Monitoring Record Report Form |
| 7/20/2011 | Response to EPA comments and revised Arkema Area Investigative Work Plan |
| 8/1/2011 | Response to EPA comments and revised On-Site Vapor Intrusion Mitigation ICM Construction Completion Rpt |
| 8/18/2011 | First 2011 Semiannual Groundwater Monitoring Report |
| 8/22/2011 | Response to EPA comments and revised Penta Area and Shipping RFI Summary Report |
| 8/22/2011 | Response to EPA comments and revised Chloromethanes I, II, Perc and Hazwaste Areas RFI Work Plan |
| 8/26/2011 | Response to EPA comments and revised Conceptual Design Groundwater ICM Modifications Report |

| CORRECTIVE ACTION CHRONOLOGY | |
|------------------------------|--|
| DATE | EVENT |
| 8/26/2011 | Response to EPA comments and revised Conceptual Design Groundwater ICM Modifications Report |
| 9/12/2011 | Response to EPA comments and revised Groundwater Monitoring Program Summary Table |
| 9/30/2011 | Response to EPA comments and revised Arkema Investigative Work Plan |
| 10/31/2011 | Vapor Intrusion ICM Inspection and Pressure Monitoring Record Report Form |
| 11/14/2011 | Received EPA comments on On-Site Groundwater RFI Work Plan |
| 11/14/2011 | Received EPA approval letter for Arkema Area Investigative Work Plan |
| 11/30/2011 | Sampling and Analysis Plan |
| 12/14/2011 | Response to Comments and Revised On-Site Groundwater RFI Work Plan |
| 1/5/2012 | EPA Comments on Draft Sampling and Analysis Plan |
| 1/27/2012 | EPA Comments on On-Site Groundwater RFI Work Plan |
| 2/8/2012 | Response to Comments and Revised Sampling and Analysis Plan |
| 2/20/2012 | Second 2011 Semiannual Groundwater Monitoring Report |
| 3/9/2012 | Revised Sampling and Analysis Plan (SAP) |
| 3/13/2012 | Revised Standard Operating Procedures 4 for SAP |
| 3/19/2012 | Response to Comments and Revised On-Site Groundwater RFI Work Plan |
| 3/21/2012 | EPA Approval letter – On-Site Groundwater RFI Work Plan |
| 4/17/2012 | Stormwater Ponds Area RFI Work Plan |
| 4/17/2012 | Fuel Depot Area RFI Work Plan |
| 8/6/2012 | Penta Area and Shipping Phase II RFI Summary Report |
| 8/6/2012 | Chloromethanes I, II, Perc and Hazwaste Areas RFI and Arkema Area Investigation Summary Report |
| 8/13/2012 | Response to Comments and Revised Stormwater Ponds RFI Work Plan and Revised Fuel Depot RFI Work Plan |
| 8/14/2012 | Inorganics Area Supplemental Report |
| 8/17/2012 | Formal Notification of Additional SWMUs |
| 8/24/2012 | First 2012 Semiannual Groundwater Monitoring Report |
| 11/14/2012 | Class I Modification Letter for Additional SWMUs |
| 11/15/2012 | Phase I On-Site Groundwater Investigation RFI Summary Report |
| 2/22/2013 | Second 2012 Semiannual Groundwater Monitoring Report |
| 3/7/2013 | Response to EPA Comments and Revised Penta Area and Shipping Phase II RFI Summary Report |
| 3/15/2013 | Response to EPA Comments and Revised Phase I On-Site Groundwater RFI Summary Report |



| CORRECTIVE ACTION CHRONOLOGY | |
|------------------------------|--|
| DATE | EVENT |
| 3/22/2013 | Fuel Depot and Stormwater Ponds Area RFI Summary Report |
| 4/19/2013 | EPA approval letter – Revised Phase I On-Site Groundwater Summary Report and Revised Phase II Penta Area and Shipping RFI Summary Report |
| 4/24/2013 | Monitoring Well Abandonment and Replacement letter |
| 4/25/2013 | EPA approval letter – Fuel Depot and Stormwater Pond Area RFI Summary Report |
| 8/22/2013 | First 2013 Semiannual Groundwater Monitoring Report |
| 2/25/2014 | Second 2013 Semi-Annual Groundwater Monitoring Report |
| 2/25/2014 | Phase II On-Site Groundwater RFI Summary Report |
| 3/11/2014 | Formal Notification of an Additional Solid Waste Management Unit |
| 5/16/2014 | EPA Comments – Phase II On-Site Groundwater Investigation RFI Summary Report |
| 6/6/2014 | Class I Permit Modification Letter, Additional Solid Waste Management Unit |
| 6/19/2014 | Response to EPA Comments and Phase II On-Site Groundwater Investigation RFI Supplemental Report |
| 6/20/2014 | Notification of Plant Changes Letter (Sump 426) |
| 7/28/2014 | Notification of Plant Changes Letter (Deep Well No. 3 cellar modifications) |
| 8/22/2014 | First 2014 Semiannual Groundwater Monitoring Report |
| 9/4/2014 | EPA approval letter – On-Site Groundwater Investigation RFI Summary Report |
| 11/26/2014 | Additional Monitoring Well Installations and Groundwater Screening Locations Letter |
| 12/18/2014 | Human Health Risk Assessment Work Plan |
| 12/18/2014 | Final Comprehensive RFI Summary Report |
| 2/13/2015 | Notification of Plant Changes Letter (Sump 417) |
| 2/23/2015 | Second 2014 Semi-Annual Groundwater Monitoring Report |
| 3/24/2015 | Response to EPA Comments and Revised Comprehensive RFI Summary Report |
| 4/2/2015 | Response to EPA Comments and Revised Human Health Risk Assessment Work Plan |

Pressure Measurement Record

Administration Building, Technical Center, Control Laboratory

Technician Name: Jeremy Raye

Date: 2/6/2015

Equipment and Calibration

Pressure Meter Make, Model, and Identifier
Omniguard 4

Unusual weather conditions ☐ yes ☒ no

Units
☒ in WC
☐ _____

Zero Calibration

☒ Pass ☐ Fail

Pressure meter reads 0.000 when both ports are open to ambient air.

Pressure measurement requires a differential pressure meter (aka micromanometer) with a resolution of 0.01 inches of water (in WC) or less (0.001 preferred). The recorded pressure measurement will be the average of readings collected over a half-hour time span (to avoid ephemeral pressure changes such as wind gusts).

| Administration Building | Time | Half-Hour Average Differential Pressure (in WC) | Minimum Effective +0.001 in WC | Notes |
|-------------------------|-------|---|--|-------|
| Second Floor | 15:15 | 0.041 | Minimum Effective +0.001 in WC | Good |
| Cafeteria | 14:35 | 0.035 | <input checked="" type="checkbox"/> Pass <input type="checkbox"/> Fail | Good |
| Basement | 14:55 | 0.021 | <input checked="" type="checkbox"/> Pass <input type="checkbox"/> Fail | Good |

Note: Inlet 1 should be open to indoor air. Inlet 2 (Reference) should be connected to the outdoor air tubing.

| Technical Center (R&D Lab) | Time | Half-Hour Average Differential Pressure (in WC) | Minimum Effective +0.001 in WC | Notes |
|----------------------------|-------|---|--|-------|
| North Basement | 12:35 | 0.021 | <input checked="" type="checkbox"/> Pass <input type="checkbox"/> Fail | Good |
| South Basement | 13:15 | 0.020 | <input checked="" type="checkbox"/> Pass <input type="checkbox"/> Fail | Good |

Note: Inlet 1 should be open to indoor air. Inlet 2 (Reference) should be connected to the outdoor air tubing.

| Control Laboratory | Time | Half-Hour Average Differential Pressure (in WC) | Minimum Effective +0.001 in WC | Notes |
|--------------------|-------|---|--|-------|
| Lab Area | 11:35 | 0.059 | <input checked="" type="checkbox"/> Pass <input type="checkbox"/> Fail | Good |

Note: This monitoring location is outside the building (unlike the Administration Building and Technical Center) and the tubing should be connected as follows: Inlet 1 should be connected to the indoor air tubing. Inlet 2 (Reference) should be open to outdoor air.

Notes:

All measuring points passed.

Upon completion, this form should be sent to the OXY Wichita Environmental Department (Lisa Blair) or Conestoga-Rovers & Associates (Doug Soutter: dsoutter@craworld.com).



Building Inspection Record

Administration Building, Technical Center, Control Laboratory

Technician Name: Jeremy Raye

Date 2/6/2015

Administration Building

Building Inspection Notes
(Building Envelope and Floors)

| | |
|--------------|------|
| Second Floor | Good |
| Cafeteria | Good |
| Basement | Good |

Additional details and corrective action

Technical Center (R&D Lab)

Building Inspection Notes
(Building Envelope and Floors)

| | |
|----------------|------|
| North Basement | Good |
| South Basement | Good |

Additional details and corrective action

Control Laboratory

Building Inspection Notes
(Building Envelope and Floors)

















| | |
|----------|------|
| Lab Area | Good |
|----------|------|

Additional details and corrective action

Upon completion, this form should be sent to the OXY Wichita Environmental Department (Lisa Blair) or Conestoga-Rovers & Associates (Doug Soutter: dsoutter@croworld.com).



Wichita Facility
DRAFT RFI Schedule
April 28, 2015

| | | | | | | | | | | | | | | | |
|---------------|---|----------------|--|-----------|---|-------------------------|---|---------------------|---|----------------|---|-------------------------|---|---------------|---|
| Task |  | Completed Task |  | Milestone |  | Rolled Up Task |  | Rolled Up Milestone |  | Split |  | Project Summary |  | Critical Task |  |
| Critical Task |  | Progress |  | Summary |  | Rolled Up Critical Task |  | Rolled Up Progress |  | External Tasks |  | External Milestone Task |  | Progress |  |

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Occidental Chemical Corporation

Wichita Facility
DRAFT RFI Schedule
April 28, 2015

